

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Market Entry and)	IB Docket No. 95-22
Regulation of)	RM-8355
Foreign-affiliated Entities)	RM-8392
)	
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)	

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AFFILIATION STATEMENT

AT&T Corp. ("AT&T"), in accordance with Section 63.11 of the Commission's Rules, submits this Affiliation Statement as required by the Commission's amended rules.¹

AT&T has previously notified the Commission of its affiliation with its U.K. affiliate, AT&T Communications Ltd,² and relies upon that notification as meeting the requirements of the Commission's rules.³

¹ Section 63.11 as amended by the Commission's Report and Order, IB Docket No. 95-22, released November 30, 1995 requires carriers with an affiliation with a foreign carrier, authorized to provide international communications service, to notify the Commission of such affiliation.

² See File No. I-T-C-96-084, filed January 26, 1996.

³ Section 63.11(a)(2) provides: "Any carrier that has previously notified the Commission of an affiliation with a foreign carrier, as defined by Section 63.01(r)(1) immediately prior to the rule's amendment in IB Docket No. 95-22, need not notify the Commission again of the same affiliation."

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CERTIFICATION UNDER FCC RULE 63.11

In accordance with the provisions of Section 63.11 of the Commission's Rules, AT&T hereby certifies that it has the following affiliations with foreign carriers:

(c) Affiliated carrier: Unitel Communications
Holdings Inc.
Country of Authorization: Canada

Affiliated carrier Subic Telecommunications
Company, Inc.
Country of Authorization: Philippines

AT&T has long standing authorization to provide service to Canada and Philippines.

(c) (1)

AT&T does not provide international service to Canada or Philippines solely through the resale of international switched or private line services of U.S. facilities-based carriers with which it has no affiliation.

(c) (2) (i)

AT&T is a corporation organized and existing under laws of the State of New York. AT&T has no 10 percent or greater shareholder or other equity holder. AT&T has no interlocking directorates.

(c) (2) (ii)

AT&T is not authorized as a private line reseller on either the U.S.-Canada or the U.S.-Philippines route.

(c) (2) (iii)

AT&T certifies that it has not agreed to accept special concessions, directly or indirectly, from any foreign carrier or administration with respect to traffic or revenue flows between the United States and any foreign country which AT&T may serve under its authority granted under Section 214 of the Communications Act and pursuant to Part 63 of the Commission's Rules, and AT&T has not agreed to enter into such agreements in the future.

- (d) AT&T is currently regulated as dominant for certain services on the U.S.-Canada route and U.S.-Philippines route. AT&T has a request pending with the Commission seeking nondominant regulatory status on all of its

international routes.⁴ With respect to Canada, AT&T should be regulated as nondominant because AT&T lacks market power in the U.S. and because AT&T's affiliate in Canada is a new market entrant, lacks market power, does not control bottleneck facilities and has no ability to discriminate against unaffiliated U.S. international carriers through preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection agreements.⁵

With respect to Philippines, AT&T should be regulated as nondominant because AT&T lacks market power in the U.S. and because AT&T's affiliate in Philippines lacks market power, operates only in a small geographic segment of the total market (the Subic Bay Freeport area), does not control bottleneck facilities and has

⁴ Motion of AT&T Corp. to be Reclassified as a Nondominant Carrier,
CC Docket No. 79-252.

⁵ AT&T previously reported its affiliation with a company in the U.K. (see footnote 2, *supra*). AT&T's provision of service on the U.S.-U.K. route should be regulated as nondominant because AT&T lacks market power in the U.S. and because its affiliate, AT&T Communications Ltd. does not control any bottleneck facilities in the U.K. AT&T's affiliate is prevented by U.K. regulation from owning international facilities. Therefore, it does not have the ability to discriminate against unaffiliated U.S. international carriers through preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection agreements.

no ability to discriminate against unaffiliated U.S. international carriers through preferential operating agreements, preferential routing of traffic, exclusive or more favorable transiting agreements, or preferential domestic access and interconnection agreements.

Respectfully submitted,

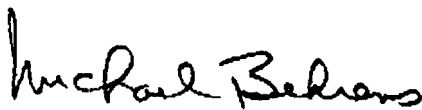
AT&T Corp.

By:



Name: Charles F. Meyer

Title: Law and Government Affairs
Director



Michael Behrens
Its Attorney

Dated: February 28, 1996

CERTIFICATE OF SERVICE

I, Chris Pereira, do hereby certify that a copy of AT&T Corp.'s Affiliation Statement, dated February 28, 1996, has been sent by United States mail, postage prepaid, to the parties listed on the attached service list.

Chris Pereira
Chris Pereira

Dated: February 28, 1996

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